

## **REMARKS**

In the Office Action of July 30, 2007, the drawings were objected to because “Fig. 1-3, 6-8 should be designated by a legend such as --Prior Art-- because only that which is old is illustrated.” In addition, the title of the invention was deemed to be not descriptive. Furthermore, the Office Action has alleged that the application does not contain an abstract of the disclosure. The Office Action has also objected to claims 1-10 because these claims allegedly include parentheses. Furthermore, claims 1 and 3-9 were rejected under 35 U.S.C. 102(b) as allegedly being anticipated by U.S. Patent No. 6,924,824 B2 (hereinafter “Adachi et al.”). Claims 2 and 10-18 were also rejected under 35 U.S.C. 103(a) as allegedly being unpatentable over Adachi et al. in view of U.S. Patent Application No. US 2002/0105510 A1 (hereinafter “Tsuchiya et al.”) or in view of U.S. Patent No. 5,844,534 (hereinafter “Okumura et al.”).

With respect to the drawing objections, Applicant hereby submits replacement sheets of drawings, which includes the legend “Prior Art” in Figs. 1-3 and 6-8. As such, Applicant respectfully requests that the objections to the drawings be withdrawn.

With respect to the title of the invention, Applicant respectfully asserts that the current title is clearly indicative of the invention to which the claims are directed. As such, Applicant respectfully requests that the requirement for a new title be withdrawn. With respect to the abstract of the disclosure, Applicant has replaced the current abstract with a new abstract that commences on a separate page.

With respect to the objections to claims 1-10, Applicant respectfully submits that these claims do not include any parentheses. Thus, these objections are not applicable to claims 1-10. As such, Applicant respectfully requests that the objections to claims 1-10 be withdrawn.

With respect to the rejections of claims 1-18, Applicant has amended the independent claims 1, 10 and 18 to more clearly distinguish the claimed invention from the cited reference of Adachi et al. Specifically, the limitations of the dependent claim 3 have been added to the independent claim 1 and the limitations of the dependent claim 11 have been included in the independent claims 10 and 18. Thus, claims 3 and 11 have been canceled. Applicant has also added new claims 19 and 20. As amended, Application respectfully asserts that the independent claims 1, 10 and 18 are not anticipated by the cited reference of Adachi et al., as explained below. In view of the claim amendments and the following remarks, Applicant respectfully requests that the amended independent claims 1, 10 and 18, as well as the dependent claims 2, 4-9, 12-17, 19 and 20, be allowed.

In responding to the Office Action, Applicant has found minor errors in the specification. Thus, Applicant has amended the specification to correct these errors.

A. Patentability of Amended Independent Claim 1

As amended, the independent claim 1 recites in part “*varying the selection of subfield from line to line in each scanning cycle such that the subfields are selected in a consecutive order from line to line as the lines are scanned consecutively, no two consecutive line scans use the same subfield and no line is scanned using the same subfield twice during the set of scanning cycles,*” which is not disclosed in the cited reference of Adachi et al. Thus, the amended independent claim 1 is not anticipated by the cited reference of Adachi et al. As such, Applicant respectfully requests that the amended independent claim 1 be allowed.

To anticipate a claim, “[t]he identical invention must be shown in as complete detail as is contained in the ...claim.” *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989); MPEP 2131.

As amended, the independent claim 1 includes the limitations of the original claim 3, which has now been canceled. With respect to the original independent

claim 1, the Office Action on pages 4 and 5 states that the cited reference of Adachi et al. discloses “varying the selection of subfield (SF1-SFn) from line to line (0-15) in each scanning cycle such that no two consecutive line scans use the same subfield (e.g., Fig5 shows line 2<sup>nd</sup> scans use SF1, but SF4 is scanned in line 3<sup>rd</sup>).” Fig. 5 of Adachi et al. is described as a diagram of a driving sequence showing an alternative example of a scan line selection sequence of embodiment 1. Thus, Fig. 5 of Adachi et al. is related to an embodiment of the invention of Adachi et al.

However, with respect to the original claim 3, the Office Action on page 5 states that “Adachi teaches the step of varying including selecting the subfields in a consecutive (sequential) order from line to line (based on fig. 12 selection sequence of subfields in consecutive order, column 2, lines 46-59). Fig. 12 and column 2, lines 46-59, of Adachi et al. are directed to a scan line selection sequence in a prior art analog gray scale display, as indicated by the brief description of the drawings in column 7 with respect to Fig. 12. Thus, Fig. 12 and column 2, lines 46-59, of Adachi et al. are related to a prior art display.

Clearly, the prior art display described in Adachi et al. does not use the driving sequence illustrated in Fig. 5 of Adachi et al. Likewise, the invention of Adachi et al. does not use the scan line selection sequence illustrated in Fig. 12 of Adachi et al. Therefore, the invention of Adachi et al. or the prior art display described in Adachi et al. does not disclose the claimed invention. Thus, the amended independent claim 1 is not anticipated by the cited reference of Adachi et al. As such, Applicant respectfully requests that the amended independent claim 1 be allowed.

#### **B. Patentability of Amended Independent Claims 10 and 18**

As amended, the independent claim 10 recites in part “*a control unit arranged to provide variation of the selection of subfield from line to line for each scanning cycle such that the subfields are selected in a consecutive order from line to line as the lines are scanned consecutively, no two consecutive line scans use the same subfield and no line is scanned using the same subfield twice during the set of scanning cycles, such that image flicker caused by the different sizes of the subfields*

*is reduced,*” which is not disclosed in the cited reference of Adachi et al. Thus, the amended independent claim 10 is not anticipated by the cited reference of Adachi et al. As such, Applicant respectfully requests that the amended independent claim 10 be allowed.

A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference. *Verdegaal Bros. v. Union Oil of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987).

As amended, the independent claim 10 includes the limitations of the original claim 11, which has now been canceled. With respect to the original claim 11, the Office Action on page 9 states that “Adachi teaches the control unit being arranged to select the subfields in a consecutive (sequential) order from line to line (scanning line, 0→1→2→...15) (column 8, lines, 26-27, column 9, lines 25-27).” These cited passages of Adachi et al. do not disclose selecting the subfields “*in a consecutive order from line to line as the lines are scanned consecutively,*” as recited in the amended independent claim 10. As illustrated in Figs. 3(b) and 3(d) of Adachi et al., the selection of the SF’s is in the following order: line 0 (SF1), line 15 (SF2), line 9 (SF4)... line 7 (SF4). Thus, the amended independent claim 10 is not anticipated by the cited reference of Adachi et al. As such, Applicant respectfully requests that the amended independent claim 10 be allowed.

The above remarks are also applicable to the amended independent claim 18, which recites limitations similar to the limitations of the amended independent claim 10. Thus, Applicant respectfully asserts that the amended independent claim 18 is also not anticipated by the cited reference of Adachi et al., and requests that the amended independent claim 18 be allowed as well.

#### C. Patentability of Dependent Claims 2, 4-9, 12-17, 19 and 20

Each of the dependent claims 2, 4-9, 12-17, 19 and 20 depends on one of the amended independent claims 1 and 10. As such, these dependent claims include all the limitations of their respective base claims. Therefore, Applicant submits that

these dependent claims are allowable for at least the same reasons as their respective base claims.

As an example, the new dependent claim 19 recites “*wherein the step of varying includes varying the selection of subfield from line to line in each scanning cycle such that no subfield of one line overlaps another subfield of another line with respect to time,*” which is not disclosed in the cited reference of Adachi et al. Thus, the new dependent claim 19 is not anticipated by the cited reference of Adachi et al.

Applicant respectfully requests reconsideration of the claims in view of the remarks made herein. A notice of allowance is earnestly solicited.

Respectfully submitted,  
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Date: October 30, 2007

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